

Appendix 2

CSG POLICY STATEMENT ON THE SECURE STORAGE, HANDLING, USE, RETENTION & DISPOSAL OF DISCLOSURE INFORMATION

1.1 General principles

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, CSG complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 2018, General Data Protection Regulation and other relevant legislation:

- in relation to the circumstances in which it seeks criminal records information;
- by being concise, clear and transparent about how it obtains and uses such information, and how (and when) it is deleted once it is no longer required; and
- by ensuring the correct handling, use, storage, retention and disposal of DBS certificates and certificate information.

CSG's data protection officer (DPO), is responsible for informing and advising CSG and its staff on its data protection obligations, including in relation to criminal records information, and for monitoring compliance with those obligations and with CSG's policies. If you have any questions or comments about the data protection content of this policy or if you need further information, you should contact the DPO at dpo@csLtd.org.uk

In some services a customer may ask for a declaration (via a letter of assurance) that the relevant DBS check has been undertaken on a CSG employee(s) who may be visiting their site to undertake work. Should a DBS check disclose information please refer to Section 6: Existing Staff and follow these requirements. In addition, the customer may ask for a commitment that should there be additional information from a disclosure that they are involved in the risk assessment and decision-making process as to whether the CSG employee can continue to work on the customer site. To ensure we remain GDPR compliant we must seek the individual's authorisation to share the disclosure information with a customer. If authorisation is not received the information will not be shared and the individual will not be able to attend the customer site. Should you require an example of a letter of assurance or further advice on ongoing employment of an employee in relation to disclosed information please contact grouphr@csLtd.org.uk

1.2 Storage & Access

Paper form Disclosure information is always kept separately and securely, in lockable, non- portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties. On-line Disclosure information is kept within the EmploymentCheck on-line system and CSG's central HR/Payroll system. This information is stored for monitoring purposes only. Access to these systems is strictly controlled and only granted to those who need this as part of their duties. All other emails or documents recording the disclosure information that are held by any of the authorised staff involved in decision making, will be securely deleted or destroyed immediately upon the risk assessment being completed.

1.3 Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosure information has been revealed for a period of up to 12 months and we recognise that it is a **criminal offence** to pass this information to anyone who is not entitled to receive it. We only share Disclosure information with those who require this as part of their duties.

1.4 Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

1.5 Retention

Once a disclosure has been received and a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is absolutely necessary. This is for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult the DBS about this and give full consideration to the Data Protection and Human Rights of the individual subject before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail. Personal information kept within the EmploymentCheck online system is purged after a period of 6 months from the date the application is archived (the recruitment decision made) as outlined in our Privacy Notice.

1.6 Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information whether this be paper form or on-line information is immediately and suitably destroyed by secure means or deleting within the EmploymentCheck online system. While disclosure documentation is waiting to be disposed of, we will ensure that this is kept in a secure lockable, non-portable storage container or securely within the on-line system. We will not keep any photocopies or other images of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.